

EXHIBIT

22

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

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4 IN RE: NATIONAL)
PRESCRIPTION) MDL No. 2804
5 OPIATE LITIGATION)
_____) Case No.
6) 1:17-MD-2804
THIS DOCUMENT RELATES)
7 TO ALL CASES) Hon. Dan A. Polster

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9 THURSDAY, NOVEMBER 15, 2018
10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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12
13 Videotaped deposition of Mark Hartman,
14 held at the offices of BakerHostetler, 200 Civic
15 Center Drive, Suite 1200, Columbus, Ohio, commencing
16 at 9:06 a.m., on the above date, before Carol A. Kirk,
17 Registered Merit Reporter and Notary Public.

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23 GOLKOW LITIGATION SERVICES
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1 A. Yes.

2 Q. "Regulatory oversight for
3 Cardinal's 27 pharmaceuticals and 50 medical
4 distribution centers nationally."

5 Across the entire country, right?

6 A. Yes.

7 Q. And let's talk about that. When
8 you were building out this new system, which,
9 obviously, you had accomplished some by the time
10 we get to this presentation, your system was
11 being devised to be applied across the entire
12 country, wasn't it?

13 A. Yes.

14 Q. All distribution centers?

15 A. Yes.

16 Q. It was a systemic application
17 from, like we talked about earlier, Auburn,
18 Washington, all the way down to Lakeland
19 Florida?

20 A. Yes.

21 Q. And you wanted that because you
22 wanted everybody operating under the same rules?

23 A. Yes.

24 Q. Everybody performing the functions

1 the same way?

2 A. Consistency and commonality is
3 what we were after.

4 Q. Absolutely.

5 Let's go to page 5.

6 This is entitled "Supply Chain
7 Integrity."

8 Do you see that?

9 A. Yes.

10 Q. And there you go again. "Supply
11 Chain Integrity is a holistic approach to the
12 supply chain ecosystem of an industry aimed at
13 creating a safe and secure supply chain from
14 manufacturer to end user."

15 And let's talk about that just for
16 a second, because this supply chain that you're
17 working with is what is known as a "closed
18 system," isn't it?

19 A. I think that's the term we used,
20 yes.

21 Q. It's also the term the legislature
22 used in creating the CSA as well. Okay?

23 But do you know or have an
24 understanding what that means?